

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

E.K. and S.K., minors, by and through their parent and next friend LINDSEY KEELEY; O.H., S.H., and H.H., minors, by and through their parent and next friend JESSICA HENNINGER; E.G., a minor, by and through his parent and next friend MEGAN JEBELES; E.Y. and C.Y., minors, by and through their parent and next friend ANNA YOUNG; L.K., L.K., and L.K., minors, by and through their parent and next friend ANNA KENKEL; and M.T., a minor, by and through her parent and next friend NATALIE TOLLEY,

Plaintiffs,

v.

DEPARTMENT OF DEFENSE
EDUCATION ACTIVITY; DR. BETH
SCHIAVINO-NARVAEZ, in her official
capacity as Director of the Department of
Defense Education Activity; and PETER
BRIAN HEGSETH, in his official capacity as
Secretary of Defense,

Defendants.

Case No. 1:25-cv-00637-PTG-IDD

Hon. Patricia Tolliver Giles

**DECLARATION OF ANNA YOUNG IN SUPPORT OF PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

I, Anna Young, declare as follows,

1. I am more than 18 years old, competent to be a witness, and the facts set forth in this declaration are based on my own personal knowledge.

2. This declaration is made in my personal capacity as a parent, and it is not intended to, nor does it represent the position of the United States Government, the Department of Defense (DoD), or any of the Armed Services.

3. I am married to an active-duty service member stationed at the Aviano Air Base in Aviano, Italy. I have four children, two of whom, E.Y. and C.Y., attend Aviano Middle-High School on the Air Base in Aviano, Italy. Aviano Middle-High School is a Department of Defense Education Activity (“DoDEA”) School. E.Y. is in the ninth grade, and C.Y. is in the eleventh grade. I take an active role in my children’s education and regularly volunteer in their school programs.

4. I grew up in California and have lived in various states across the U.S., as well as internationally. Since getting married, our family has been stationed at multiple Air Bases around the world, including in Japan, South Korea, Germany, and Italy. Frequent relocations have been a consistent part of our journey as a military family. Overall, E.Y. has moved five times; she has attended three elementary schools, two middle schools, and one high school. C.Y. has moved six times and attended three elementary schools, one middle school and one high school.

5. C.Y. began in DoDEA schools as a kindergartener in Osan, AB South Korea and E.Y. began in the second grade in Spangdahlem, AB Germany. As a family, we have occasionally chosen to enroll E.Y. and C.Y. in alternative educational programs. Nonetheless, I have consistently valued the availability of consistent, high-quality DoDEA schools.

6. Similarly, E.Y. and C.Y. appreciate the numerous opportunities available to them and the ease of access to these opportunities at their DoDEA schools. C.Y. enjoys her AP Psychology class and takes pleasure in reading the U.S. History textbook. This school year, E.Y.

was limited to taking AP courses available to her grade level, but she plans to enroll in a wider variety of courses as she progresses.

7. E.Y. is an avid reader, with a particular interest in historical fiction and classic novels. As a parent, I am committed to nurturing my daughters' curiosity. We maintain a home library that includes numerous banned books, which E.Y. frequently explores. Given the recent changes in the school's library collection and my daughters' curriculum, the importance of our home library and the broad access it provides for my children has increased significantly.

8. Over the years, E.Y. and C.Y. have actively participated in a variety of extracurricular activities offered through their DoDEA schools. Both are members of the National Honor Society. C.Y. has played basketball and volleyball, and she has been involved with the cross-country club. She serves in Student Government, representing the entire school, as well as in Class Government, representing her class. E.Y. has played volleyball and soccer, is a member of the Red Cross Club, and has participated in the Robotics Club. Most of these activities are provided through the school, except for the Red Cross, which is organized through the Base.

9. Over the course of approximately eight years that my children have attended DoDEA schools, our family has benefited from excellent teachers who have consistently gone above and beyond to support my daughters, encouraging them to reach their full potential. For instance, E.Y.'s sixth-grade mathematics teacher recognized her aptitude in math and provided her with advanced materials, despite the absence of a formal advanced math program in middle schools. Furthermore, I appreciate the small class sizes, which ensure that C.Y. and E.Y. receive substantial support in both their academic pursuits and extracurricular activities. In my experience, most of the faculty and staff are familiar with nearly every student, contributing to a close and tight-knit school environment.

10. As a parent, I also greatly value the multicultural experiences my children have encountered. I believe these experiences have helped them become well-rounded individuals who are empathetic, open-minded, and capable of connecting with people from diverse backgrounds with respect and curiosity. Until recently, C.Y. and E.Y. regularly participated in cultural celebrations in each country where we lived. These celebrations are typically organized through their DoDEA schools and include observing cultural holidays and traditions of the host country, as well as exposure to several new languages, among other activities.

11. Earlier this year, the White House issued three Executive Orders that DoDEA has cited as justification for the changes we are starting to see in our school. Those Executive Orders are Order No. 14168, Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government; Order No. 14185, Restoring America's Fighting Force and Order No. 14190, Ending Radical Indoctrination in K-12 Schooling (collectively, with the "Executive Orders").

12. On February 12, 2025, I requested a copy of the materials selected for review/removal at Aviano Middle-High School. The school principal told me that items were under operational review and that no books had yet been removed from the school. I followed-up but was never provided with a list of materials relocated for review. Despite this lack of transparency, I have been able to confirm that books have in fact been removed from DoDEA school libraries. When I again followed up with an administrator, I was told that the books are still available, but only to DoDEA employees. This is clearly a restriction on my children's access to information.

13. On March 3, 2025, I received an email from DoDEA Europe about curriculum changes to Advanced Placement Psychology – a course C.Y. is currently enrolled in. The email

stated that Module 32 on Gender and Sex was going to be removed. Fortunately, C.Y.'s teacher had already covered this unit. However, due to the curriculum changes, the teacher was unable to review the materials at the end of the year, as she typically would, to prepare students for the exam. I am worried this lack of review will place C.Y. at a disadvantage compared to other students taking the A.P. Psychology exam who will benefit from the holistic end of year review of materials on *all* topics. Such a holistic review was not available to C.Y. because of the curriculum changes at DoDEA schools. Additionally, if E.Y. decides to take AP Psychology in her sophomore, junior, or senior year, she will not have access to this important information.

14. E.Y. has been quite disappointed by her school's decision to restrict access to information. In response, she participated in a walkout at school to protest the changes to the curriculum and reading materials. E.Y. was one of six freshmen students who took part in the walkout. C.Y. would have participated in the protest, but she was unable to attend school that day because she was sick.

15. C.Y. informed me that the Gay Straight Alliance (GSA) has been disbanded. She has also noticed other changes in the usual school routine. Typically, during Black History Month and Women's History Month, administrators make announcements featuring fun facts or quotes related to historical figures or significant events. Unfortunately, these announcements were canceled this year. Additionally, the posters and decorations that are normally displayed in the hallways have been removed. In one instance, a teacher was told to remove decorations and posters of women and African American historical figures. Lastly, Asian American and Pacific Islander Heritage Month, which is usually celebrated to honor the heritage of service members from those backgrounds, is unlikely to be commemorated this year. C.Y. is disappointed by the absence of these celebrations and commemorations.

16. My husband intends to retire in Summer 2026. By that time, C.Y. will graduate from Aviano Middle-High School. E.Y., however, will be beginning her junior year. Whether E.Y. would continue in DoDEA schools is dependent on the job opportunities available to my husband at that time and our evaluation of the options available for E.Y.'s education.

I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed on May 6, 2025.

/s/ Anna Young

Anna Young

ECF ATTESTATION

I, Matthew Callahan, am the ECF User whose ID and password are being used to file this document. I have obtained authorization to file this document from Anna Young, declarant.

/s/ Matthew Callahan

Matthew Callahan

ACLU OF VIRGINIA FOUNDATION

Attorney for Plaintiffs